

**IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

ROSELYN BRASWELL,)	
)	
Plaintiff,)	Case No.: 2:21-cv-25-ECM
)	
v.)	
)	
BOW PLUMBING GROUP, INC.,)	
)	
Defendants.)	

JOINT MOTION TO EXTEND DEADLINES

COME NOW the Parties, Plaintiff Roselyn Braswell (hereinafter “Braswell”) and Defendant Bow Plumbing Group Inc. (hereinafter “BPG”), and respectfully request an extension of all dates and deadlines set out in this Honorable Court’s Orders dated November 15, 2021 (Doc. 28) and December 3, 2021 (Doc. 31). In support, the Parties state as follows:

1. The Court’s current schedule includes the following deadlines:
 - a. The expert disclosure deadline on class certification issues from Plaintiff is June 14, 2022.
 - b. The expert disclosure deadline on class certification issues from the Defendant is August 2, 2022.

c. The deadline for motions for class certification is September 14, 2022.

d. The expert disclosure deadline on the merits from the Plaintiff is December 6, 2022.

e. The expert disclosure deadline on the merits from the Defendant is January 5, 2023.

f. The discovery deadline is March 6, 2023.

g. The dispositive motions deadline is April 5, 2023.

2. Although the Parties are working together in good faith to complete the requisite discovery necessary to satisfy each of these deadlines, the circumstances of this case are such that additional time will be necessary to adequately prepare for both the Plaintiff and Defendant's expert disclosures on class certification issues, as well as the motion for class certification.

3. Specifically, this Court recently heard oral arguments on Plaintiff's Motion to Compel (Doc. 34) on May 31, 2022 at which the Parties came to a number of agreements on certain documents and information. However, the Parties were unable to agree on remaining issues which this Court is still considering.

4. Additionally, the Parties are attempting to schedule the inspection of Plaintiff Braswell's home. To schedule the inspection, the Parties are coordinating

the schedules of several individuals, including a representative from BPG. Most individuals required for inspections will be traveling from out of state or even out of the country. The Parties expect that the information gathered at the inspection of Plaintiff Braswell's home will be pertinent to the above referenced deadlines.

5. Due to the foregoing, counsel for the Parties request an extension of the deadlines set in this case. The Parties, however, do not agree on the amount of extension the Court should grant.

6. BPG is willing to agree to a sixty (60) day extension. Plaintiff seeks ninety (90) days given that Plaintiff has not received an order on her Motion to Compel and BPG is still in the process of obtaining and preparing documents agreed to produce during the hearing on Plaintiff's Motion to Compel. Nevertheless, both Parties agree that an extension is in the best interest of judicial efficiency.

WHEREFORE, premises considered, the Parties respectfully request a sixty (60) day extension of all dates and deadlines set out in this Honorable Court's Orders dated November 15, 2021 (Doc. 28) and December 3, 2021 (Doc. 31).

Respectfully submitted this the 9th day of June, 2022.

/s/ Kirby D. Farris

Kirby D. Farris (ASB-2224-R78K)
Calle Mendenhall (ASB-7985-W37E)
Malia D. Tartt (ASB-9073-M40J)
Attorneys for Plaintiff

OF COUNSEL:

FARRIS, RILEY & PITT, LLP

1700 Financial Center
505 20th Street North
Birmingham, AL 35203
T: 205-324-1212
F: 205-324-1255
kfarris@frplegal.com
cmendenhall@frplegal.com
mtartt@frplegal.com

/s/ Angel A. Croes (with permission)

Glenn E. Ireland (ASB-4158-E51G)
Angel A. Croes (ASB-6785-E49D)
Hannah R. DellaSala (ASB-1406-Q44G)
Attorneys for Defendant

OF COUNSEL:

CARR ALLISON

100 Vestavia Parkway
Birmingham, Alabama 35216
T: (205) 822-2006
F: (205) 822-20257
cireland@carrallison.com
acroes@carrallison.com
hdellasala@carrallison.com